

REMARKS

By this Amendment, Applicant has amended claims 1, 17-19, 24 and 25 and has added new dependent claims 26-30. Applicant submits that no new matter has been introduced and that the amendments find support in the application as originally filed. Claims 1, 2, 4, 5, 7-20, 24 and 25 are pending, of which claims 17, 18, 24 and 25 are withdrawn from consideration. Reconsideration and allowance of the pending claims, in view of the following remarks, are respectfully requested.

Applicant submits that claims 1 and 19 are generic of at least one or more claims in this application. Therefore, upon allowance of claims 1 and 19, Applicant respectfully requests rejoinder of, for example, claims 17, 18, 24 and 25, each of which include all the limitations of allowable claim 1 and 19 respectively and are combination claims comprising subcombinations of claim 1 and 19. See MPEP, §821.04.

Claims 1, 2, 4, 9-16, 19 and 20 stand rejected under 35 U.S.C. §103(a) as allegedly being obvious in view of U.S. Patent No. 4,985,651 to Chitayat et al. ("Chitayat '651") in view of U.S. Patent Application Publication No. 2002/0018195 to Iwamoto et al. ("Iwamoto"). Applicant respectfully traverses.

Applicant respectfully submits that the cited portions of Chitayat '651 and Iwamoto fail to disclose or render obvious a system for carrying and moving an object in a plane, comprising, *inter alia*, a first and a second linear actuator configured to support said object carrier and move said object carrier in a first direction, said first and second linear actuators extending in parallel along said first direction, said first and second linear actuators being electromagnetic linear actuators comprising: (i) a magnetic structure, and (ii) a coil structure, wherein the coil structure and the magnetic structure are positioned relative to each other and separated by an air bearing configured to support said object carrier during motion at a first position along said first direction, the first position being on one end of whichever of the magnetic structure or coil structure is connected to the object carrier, and at a second position displaced from the first position along said first direction, the second position being on the opposite end of whichever of the magnetic structure or coil structure is connected to the object carrier, wherein the first and second positions and whichever of the magnetic structure or coil structure is connected to the object carrier are substantially in a same plane as recited

in claim 1. Similarly, Applicant respectfully submits that the cited portions of Chitayat '651 and Iwamoto fail to disclose or render obvious a method for carrying and moving an object in a plane, comprising, *inter alia*, an object carrier being moveable by a first and a second linear actuator in a first direction and by a third and a fourth linear actuator in a second direction, said first and second linear actuators being adapted to support said object carrier by having a coil structure and a magnetic structure that are separated by an air bearing configured to support said object carrier during motion at a first position along said first direction, the first position being on one end of whichever of the magnetic structure or coil structure is connected to the object carrier, and at a second position displaced from the first position along said first direction, the second position being on the opposite end of whichever of the magnetic structure or coil structure is connected to the object carrier, wherein the first and second positions and whichever of the magnetic structure or coil structure is connected to the object carrier are substantially in a same plane as recited in claim 19.

For example, the cited portions of Chitayat '651 merely disclose vertical air bearings 50 and 64 to support in the vertical direction, the vertical air bearings 50 and 64 being displaced from each in the non-moving direction (i.e., across the page in Figure 2 of Chitayat '651) and a horizontal air bearing 52 to hold in the horizontal direction at a single position. Therefore, the cited portions of Chitayat '651 fail to disclose or teach an air bearing configured to support said object carrier during motion at a first position along said first direction, the first position being on one end of whichever of the magnetic structure or coil structure is connected to the object carrier, and at a second position displaced from the first position along said first direction, the second position being on the opposite end of whichever of the magnetic structure or coil structure is connected to the object carrier

Further, even assuming *arguendo* that the cited portions of Chitayat '651 are properly combinable with Iwamoto (which Applicant does not concede), the cited portions of Iwamoto fail to overcome the deficiencies of Chitayat '651. Like the cited portions of Chitayat '651, Iwamoto discloses air bearings 7 and 9 to support in the Z direction, the air bearings 7 and 9 being displaced from each other in the non-moving X direction. Further, Applicant submits that none of air bearings 35 are configured to support said object carrier during motion at a first position along said first direction, the first position being on one end of whichever of the magnetic structure or coil structure is connected to the object carrier, and at a second position displaced from the first position along said first direction, the second position being on the opposite end of whichever of the magnetic structure or coil structure is connected to the

object carrier, wherein the first and second positions and whichever of the magnetic structure or coil structure is connected to the object carrier are substantially in a same plane.

Therefore, claims 1 and 19 are patentable over the cited portions of Chitayat '651 and Iwamoto.

Claims 2, 4 and 9-16 depend from claim 1 and are patentable for at least the same reasons provided above related to claim 1, and for the additional features recited therein. Claim 20 depends from claim 19 and is patentable for at least the same reasons provided above related to claim 19, and for the additional features recited therein.

Accordingly, reconsideration and withdrawal of the rejection of claims 1, 2, 4, 9-16 and 19-20 under 35 U.S.C. §103(a) based on Chitayat '651 and Iwamoto are respectfully requested.

Claims 5, 7 and 8 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chitayat '651 in view Iwamoto further in view of U.S. Patent No. 5,519,266 to Chitayat '266. Applicant respectfully traverses.

Claims 5, 7 and 8 depend from claim 1 and are patentable over the cited portions of Chitayat '651 and Iwamoto for at least the same reasons provided above related to claim 1, and for the additional features recited therein.

Further, even assuming *arguendo* that the cited portions of Chitayat '266 are properly combinable with Chitayat '651 and Iwamoto (which Applicant does not concede), the cited portions of Chitayat '266 fail to overcome the deficiencies of Chitayat '651 and Iwamoto. The cited portions of Chitayat '266 fail to have any disclosure regarding air bearing. Therefore, claim 1 is patentable. Claims 5, 7 and 8 depend from claim 1 and are therefore patentable over the cited portions of Chitayat '651, Iwamoto, Chitayat '266 and any proper combination thereof for at least the same reasons provided above related to claim 1, and for the additional features recited therein.

Accordingly, reconsideration and withdrawal of the rejection of claims 5, 7 and 8 under 35 U.S.C. §103(a) based on Chitayat '651 in view of Iwamoto and further in view of Chitayat '266 are respectfully requested.

New claims 26-30 are substantially similar to, and find support in, pending claims 2, 4, 10, 5, and 9 respectively. Further, new claims 26-30 depend from claim 19 and are

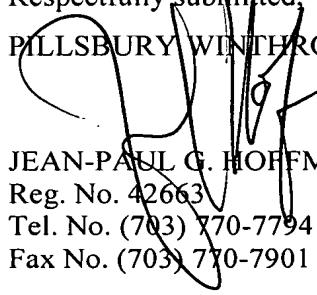
patentable for at least the same reasons provided above related to claim 19, and for the additional features recited therein.

In view of the above remarks, it is respectfully submitted that all of the claims are allowable and the entire application is in condition for allowance. Should the Examiner believe that anything further is desirable to place the application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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